

425.0005

STATE OF CALIFORNIA		TO: HQ – Legal		SUBJECT: J--- S---		DATE: 8/18/92	
MINI-MEMO				dba: S--- C--- SR -- XX-XXXXXX			
STD 100-B (REV. 9-7)							
M	Mr. S--- was contacted and he states that State Licensed Acupuncturists						
E	are considered primary physicians as far as prescriptions are concerned.						
S	Has Regulation 1591 been expanded to include acupuncturists and their						
S	writing of drugless substances prescriptions? He was unable to cite						
A	the California law which changed this.						
G							
E							
RETURN TO		SIGNED G. Jung	ADDRESS CH Compliance		PHONE ATSS 561-0348		
R	No. Acupuncturists are not persons “authorized to prescribe”						
E	medicines under Reg. 1591(a)(1). Bus. & Prof. Code only permits						
P	physicians, dentists, podiatrists or veterinarians to write						
L	prescriptions for medicines. Acupuncturists may only “prescribe						
Y	herbs as dietary supplements” under Bus. & Prof. Code 54937.						
SIGNED John Waid			ADDRESS LEGAL			DATE 9/24/92	

SEND PARTS 1 AND 3 INTACT – PART 3 WILL BE RETURNED WITH REPLY